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State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

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Refer to: L1630200005 -- St. Clair County
Sauget Sites (Area 1)-- Sauget
Superfund/Compliance

May 2, 1997

Mr. D. Michael Light
Manager, Remedial Projects
Monsanto Chemical Company
800 North Lindbergh Boulevard
St. Louis, Missouri 63167

Dear Mr. Light:

As promised, we are submitting formal comments on Monsanto's application for entry into the Site Remediation Program (SRP). Your proposal to perform investigations at selected Sauget Area 1 Superfund Sites as well as the levels of work effort and funding Monsanto is preparing to undertake are commendable. I regret to inform you, however, that pursuant to 35IAC 740.210 (as proposed), this proposal is hereby denied. The Agency cannot accept this proposal as written because Monsanto did not obtain written access from property owners in areas which would undergo investigation.

As a basis for a future RI/FS Scope of Work, however, IEPA and USEPA agree that several elements of your proposal need to be modified. The major concerns that both agencies have expressed about this proposal include Monsanto's unwillingness to address the entire listed site (inclusive of Dead Creek Segment F), a lack of commitment to perform an NCP-compliant Risk Assessment and no apparent intent to perform any off-site soil sampling (e.g. residential sampling). These concerns and others need to be addressed as part of an upcoming workplan proposal that will be bound by an enforceable agreement between Monsanto and/or other PRPs and the government.


IEPA, in conjunction with the Illinois Attorney General's Office will be preparing a draft RI/FS consent decree that would address concerns over work performed under enforceable agreements as well as past costs that the State has incurred at this site. IEPA will also be initiating a general notice of liability process utilizing information obtained by earlier information request efforts as well as from USEPA's recent 104(e) requests. These actions will identify other PRPs that have liability at this site

and will hopefully address IEPA's concerns over orphan shares by bringing other parties to finance these investigations. IEPA and USEPA have agreed to set a 60 day deadline (from the date of this letter) for a "good faith" offer from Monsanto to perform an RI/FS for the Sauget Area 1 Sites and a removal action for Dead Creek. IEPA and Monsanto must complete negotiations on a Consent Decree no later than 90 days after the good faith offer is accepted by the State.

I would recommend that we meet again to discuss the above-mentioned issues within the next two weeks. IEPA believes that there are several usable elements from your existing proposal that could be incorporated into a workplan that will govern upcoming site investigations.

Please feel free to call me if you have questions or concerns about this letter.

Yours Truly,


Terry G. Ayers, Manager
National Priorities Unit
Division of Remediation Management
Bureau of Land

cc: Lawrence Eastep
William Child
Paul Takacs
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Division File